

## Exhibit A

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**From:** Spear, Ryan M. (Perkins Coie) <RSpear@perkinscoie.com>  
**Sent:** Friday, September 8, 2017 4:27 PM  
**To:** McKnight, Katherine L.; Braden, E. Mark; Raile, Richard; dloesq@aol.com; Raphael, Stuart A.; McGuire, Matthew R.; Cox, Trevor S.  
**Cc:** Branch, Aria C. (Perkins Coie); Hamilton, Kevin J. (Perkins Coie); Khanna, Abha (Perkins Coie); Stafford, Ben (Perkins Coie); Louijeune, Ruthzee (Perkins Coie)  
**Subject:** Bethune-Hill v. Va. St. Bd. of Elections / Plaintiffs' initial discovery designations  
**Attachments:** 1-[Designated] Intervenors responses to Plaintiffs RFAs.pdf; 2-[Designated] Intervenors responses to Plaintiffs ROGs.pdf; 3-[Designated] Intervenors responses to Plaintiffs RFPs.pdf; 4-[Designated] Defendants responses to Plaintiffs RFPs.pdf; 5-[Designated] C. Marston deposition transcript.pdf; 6-[Designated] R. Tyler deposition transcript.pdf

**Importance:** High

Dear counsel,

Pursuant to paragraph 10 of the Court's Memorandum Order (Dkt. 173), please find attached Plaintiffs' initial discovery designations, consisting of portions of the following:

1. Intervenors' 7/26/17 responses to Plaintiffs' Requests for Admission
2. Intervenors' 7/26/17 responses to Plaintiffs' Interrogatories
3. Intervenors' 7/26/17 responses to Plaintiffs' Requests for Production
4. Defendants' 7/26/17 responses to Plaintiffs' Requests for Production
5. Transcript of 5/18/15 deposition of C. Marston
6. Transcript of 5/19/15 deposition of R. Tyler

We have highlighted in **green** our initial designations for these documents. Please note that our designations for the transcripts *include* the designations that *all* parties made before the first trial. In other words, the highlighted portions encompass both the designations that all parties made before the first trial *and* Plaintiffs' "new" designations.

We suggest using the same protocol that the parties used last time around. That is, once the parties have identified their initial designations and fairness or rebuttal designations, then we can create documents that show only those portions of the text that one or more parties have designated. We can then jointly file those documents as "conformed" copies for the Court. That assumes, of course, that there are no disputes over the designations, but I'm hopeful that will be the case.

We look forward to receiving Intervenors' and Defendants' designations.

Thanks,

Ryan

**Ryan Spear | Perkins Coie LLP**

**COUNSEL**

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**From:** McKnight, Katherine L. [mailto:[kmcknight@bakerlaw.com](mailto:kmcknight@bakerlaw.com)]

**Sent:** Wednesday, July 26, 2017 8:59 PM

**To:** Spear, Ryan M. (SEA); Braden, E. Mark; Raile, Richard; [dloesq@aol.com](mailto:dloesq@aol.com)

**Cc:** Raphael, Stuart A.; McGuire, Matthew R.; Cox, Trevor S.; Branch, Aria C. (WDC); Hamilton, Kevin J. (SEA); Khanna, Abha (SEA); Stafford, Ben (SEA); Elias, Marc (WDC); Spiva, Bruce V. (WDC)

**Subject:** Bethune-Hill v. Va. St. Bd. of Elections - Defendant-Intervenors' objections, answers and responses to Plaintiffs' written discovery

Dear Counsel:

Attached are Defendant-Intervenors' objections, answers and responses to Plaintiffs' written discovery.

Kind regards,

Kate

**Katherine L. McKnight**

Partner

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